

07 CIV 7495

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
VALJEAN BROOKSHAW,

Plaintiff,

-against-

THE CITY OF NEW YORK, et al

Defendants
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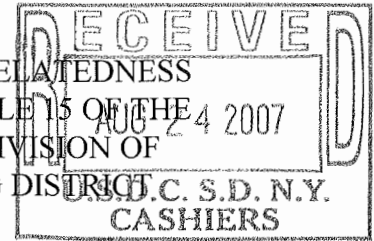
STATEMENT OF RELATEDNESS

PURSUANT TO RULE 15 OF THE

RULES FOR THE DIVISION OF

BUSINESS AMONG DISTRICT JUDGES

JUDGES



Now comes the plaintiff, VALJEAN BROOKSHAW by and through his counsel, BELDOCK LEVINE & HOFFMAN, LLP and make the following statement of relatedness pursuant to Rule 15 of the Rules for the Division of Business Among District Judges

1. This case should be filed as related to *MacNamara, et al., v. The City of New York, et al.* 04-CV-9216 (KMK)(JCF), one of literally dozens of cases arising from the arrests of protesters during the Republican National Convention ("RNC") in New York City in the summer of 2004 which are currently consolidated for the purposes of discovery in front of Magistrate Judge Francis and Judge Karas. This case raises substantially identical claims concerning the actions of defendants in preventing and/or interfering with the rights of plaintiff to engage in First Amendment protected activity at political demonstrations during the RNC. In particular, this case, as well as the currently consolidated cases challenge the defendants' alleged policy of using mass arrests without probable cause not in furtherance of legitimate law enforcement ends but rather as a means of preventing, diminishing and/or punishing lawful political speech and assembly.

2. Permitting this case to be filed as related to *MacNamara*, as well as the other consolidated RNC cases, will promote a substantial savings in judicial resources. If relatedness is

denied, two judges of this district will be asked to preside over cases which factually and legally virtually identical claims. Permitting this case to be filed as related to *MacNamara* will eliminate the possibility of having two judges of this district preside over claims challenging the same policies.

Dated: August 24, 2007
New York, New York

_____/s/_____
JONATHAN C. MOORE (JM 6902)
RACHEL KLEINMAN (RK 2141)

Beldock Levine & Hoffman LLP
99 Park Avenue, Suite 1600
New York, New York 10016
(212) 490-0400
Attorneys for the Plaintiff